

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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SCOTTIE NELL HUGHES, :  
: Plaintiff, : Civil Action No.: 17-cv-07093 (WHP)  
: :  
: v. :  
: :  
TWENTY-FIRST CENTURY FOX, INC., FOX : DECLARATION OF JEANNE M.  
NEWS NETWORK LLC, DIANNE BRANDI, in : CHRISTENSEN IN SUPPORT OF  
her individual and professional capacities, and : MOTION TO WITHDRAW AS  
IRENA BRIGANTI, in her individual and : COUNSEL OF RECORD  
professional capacities, CHARLES PAYNE, in his :  
individual and professional capacities, :  
: Defendants. :  
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**JEANNE M. CHRISTENSEN, ESQ.**, an attorney duly admitted to practice before this court, hereby affirms under penalty of perjury as follows:

1. I am a Partner at the law firm Wigdor LLP (“Wigdor” or “Counsel”), attorneys for Plaintiff Scottie Nell Hughes in the above-captioned matter in connection with her claims alleged against Defendants Twenty-First Century Fox, Inc., Fox News Network LLC, (“Fox” or the “Company”), Dianne Brandi and Irena Briganti (the “Individual Fox Defendants”) and Charles Payne (“Payne”).

2. I submit this Declaration in support of Wigdor LLP’s motion to withdraw as counsel of record in this action.

3. For the reasons set forth below and in the accompanying supporting memorandum of law, we respectfully request that the Court grant approval of the motion in its entirety.

4. This action is in the early stages of litigation, as the Court’s decision on Defendants’ motion to dismiss recently was filed on April 24, 2018 (Dkt. No. 61).

5. Pursuant to Rule 1.4 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York (the “Local Rules”) and Rule 1.16(c) of New York State’s Rules of Professional Conduct (the “RPC”), where a motion to withdraw is filed and substitute counsel has not entered an appearance on the affected party’s behalf, the decision as to whether to allow counsel to withdraw its representation is within the Court’s discretion.

6. I am of the opinion that there is an irrevocable breakdown of the attorney-client relationship with respect to Wigdor LLP and Ms. Hughes. Counsel is, of course, more than willing to provide additional information, consistent with Wigdor’s ethical obligations, *in camera* and *ex parte*, or otherwise, as the Court requests, or if the Court prefers to assign this matter to a United States Magistrate Judge for consideration.

7. On April 12, 2018, we informed Ms. Hughes that Wigdor LLP would be filing a motion to withdraw.

8. Wigdor LLP is not asserting a retaining lien, but it is asserting a charging lien in connection with this matter.

9. We have informed Ms. Hughes that we will cooperate with her new counsel to ensure a smooth transition of the matter.

Dated: May 14, 2018  
New York, New York

  
Jeanne M. Christensen